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Attorneys for the Respondent

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

MOHAMMAD AL FALAHI,

Petitioner,

vs.

UNITED STATES CITIZENSHIP AND
IMMIGRATION SERVICES,

Respondent.

Case No.: 2:16-cv-02921-JAD-VCF

**JOINT MOTION FOR AN EXTENSION
OF TIME TO FILE DISPOSTIVE
MOTIONS**

The above named parties, by and through their respective counsel of record hereby submit this joint motion for an extension of time to file dispositive motions pursuant to LR IA 6-1.

This is the first motion for extension of time to file dispositive motions. Good cause exists for this extension. On October 6, 2017, Petitioner served a Rule 30(b)(6) deposition notice, requesting to depose a U.S. Citizenship and Immigration Services (“USCIS”) employee on the USCIS’ Controlled Application Review and Resolution Process (“CARRP”) and noticed Respondent of intention to depose the two USCIS employees that interviewed Petitioner about his application for naturalization. Petitioner plans to ask these USCIS employees questions

1 regarding the CARRP. On October 11, 2017, Respondent filed a motion for a protective order to
2 limit discovery into the CARRP. The parties met and conferred but were unable to resolve the
3 discovery dispute. This extension of time will allow the Court time to consider the motion for
4 the protective order and to allow for the parties to complete the depositions prior to submission
5 of dispositive motions.

6 Pursuant to the Court's Joint Discovery Plan and Scheduling Order, ECF No. 10, the date
7 for filing dispositive motions shall not be later than thirty (30) days after the discovery cut-off
8 date, which in this matter is not later than Wednesday November 22, 2017. ECF No. 10, at 3.
9 The Parties move that the date for filing dispositive motion shall not be later than ninety (90)
10 days after the Court rules on the motion for a protective order. The date for the completion of
11 the depositions shall be within thirty (30) days after the Court rules on the motion for a
12 protective order. The discovery period will remain open for sole purpose of completing the
13 depositions.
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2 Date: October 11, 2017

3 /s/ Amy Rose
4 AMY ROSE
5 Nevada Bar 12081
6 American Civil Liberties Union of Nevada
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8 Las Vegas, NV 89106

9 ALEXANDRA CHRYSANTHIS
10 Nevada Bar 3231
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12 633 S 4th St #7
13 Las Vegas, NV 89101

14 *Counsel for the Petitioner*

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16 IT IS HEREBY ORDERED that
17 dispositive motions must be
18 filed by January 31, 2018.

Respectfully submitted,

CHAD A. READLER
Acting Assistant Attorney General

WILLIAM C. PEACHEY
Director

EDWARD S. WHITE
Senior Litigation Counsel

/s/ Joseph F. Carilli, Jr.
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Counsel for the Respondent

19 IT IS SO ORDERED:

20 UNITED STATES MAGISTRATE JUDGE,

21 DATED: October 13, 2017

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